

August 9, 2004

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

We are writing to you in regards to the Docket No. 2004N-0264, and Regulatory Id. No. 0910-AF46, which involves BSE in farm animals.

Sandy Bay Mink Ranch has been in business for forty-one years. We are a small family owned company that employees about twenty full time employees. We are involved in two businesses. The first one is raising about 40,000 mink. The second one is picking up dead and down cow, calves, and horses. The two businesses work well together. The mink need a constant supply of fresh feed. The dead and down that we pick up from local farmers supplies about 60-70% of the #16000 batch that we grind and feed daily. We also sell pet food to greyhound parks. Over 1 million pounds of ground boneless denatured beef gets sold every year. We believe any ban would wipe out one business and seriously damage the mink ranch with the high cost of replacement feed. Sandy Bay Mink Ranch has been feeding the lung, liver, tripe, and whole carcasses excluding the head and hooves to the mink for forty-one years and has never had any problem. They say this is the high risk of material for BSE. If it is, don't you think it would have showed up in the mink after feeding them this material for all these years? Sandy Bay Mink Ranch picks up 8-10 thousand cows and 18-20 thousand calves every year. We are currently involved in the Aphis BSE Surveillance testing. Sandy Bay Mink Ranch believes continued testing of all subject animals would be the best action instead of a ban. If any animal would be found, only that animal would be disposed of. There would be no reason to destroy an entire industry! We pick up farmers animals in about a fifty mile radius. That adds up to about 30,000 carcasses or about 14 million pounds of decaying animals lying on a local farm land or compost piles. What about local water supply and the smell from all these decaying carcasses? Landfills won't take it because it will become hazardous material. We are only a small part of a large industry in Wisconsin. There are many other companies doing what we do. If you add it all up you will have a big stink on your hands. Please consider testing or random testing as a solution not a ban. We will be put out of business. There has only been one animal found from Canada. There is no problem in the United States.

Sincerely,
Kurt Wiebensohn, partner
Sandy Bay Mink Ranch, LLC
2228 Cherney Road
Mishicot, WI 54228

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